

# **EXHIBIT “A”**

**(Complaint)**

20324255  
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**LAW OFFICES OF GREGG WILLIAMS**  
 197 Route 18S, South Tower, Suite 232S  
 East Brunswick, NJ 08816  
 (732) 514-6635  
 Attorney for Plaintiff, Jessika Cintron

JESSIKA CINTRON

Plaintiff(s),

vs.

J&B HUNT; KENNETH DIAZ; "JOHN DOES" 1-7;  
 AS FICTITIOUS NAMES, TRUE NAMES BEING:  
 UNKNOWN; and "ABC CORPS" 1-7 AS:  
 FICTITIOUS NAMES, TRUE NAMES BEING:  
 UNKNOWN,

Defendant(s).

SUPERIOR COURT OF NEW JERSEY  
 LAW DIVISION: MIDDLESEX COUNTY

DOCKET NO.: MID L 5735-20

CIVIL ACTION

Corporate Claims

SUMMONS

AUG 27 2020

Received

FROM THE STATE OF NEW JERSEY TO: **J&B HUNT**

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The Complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (A directory of the addresses of each deputy clerk of the Superior Court is available in the Civil Division Management Office in the county listed above and online at [http://www.judiciary.state.nj.us/prose/10153\\_deptyclerklawref.pdf](http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf). If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey, and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed.

You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$175.00 and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages, or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management office in the county listed above and online at [http://www.judiciary.state.nj.us/prose/10153\\_deptyclerklawref.pdf](http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf).

/s/ Michelle M. Smith, Esq.  
 Acting Clerk of the Superior Court

DATED: August 6, 2020

Name of Defendant to be served: **J&B Hunt**

Address of Defendant to be served: **200 E. 146<sup>th</sup> Street, Noblesville, IN 46060**

LAW OFFICES OF GREGG A. WILLIAMS

By: Gregg A. Williams, Esq., NJ ID: 023162005

197 Route 18S Suite 232S

East Brunswick, NJ 08816

Phone No: (732) 514-6635

Attorney for the Plaintiff, Jessika Cintron

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JESSIKA CINTRON

Plaintiff(s),

vs.

J&B HUNT; KENNETH DIAZ; "JOHN DOES" 1-7 )  
AS FICTITIOUS NAMES, TRUE NAMES BEING )  
UNKNOWN; and "ABC CORPS" 1-7 AS )  
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Defendant(s).  
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)  
) SUPERIOR COURT OF NEW JERSEY  
) LAW DIVISION- MIDDLESEX COUNTY  
)

) Docket No.: MIDL5735-20  
)

) CIVIL ACTION

) COMPLAINT and JURY DEMAND  
)

The plaintiff, JESSIKA CINTRON residing in the City of Linden, Union County, State of New Jersey by way of Complaint against the defendant(s) says:

#### FIRST COUNT

1. On or about March 12, 2020 the Defendant, KENNETH DIAZ was the operator of a vehicle owned by Defendant, J&B HUNT being driven on Cayuga Road in the City of Cranford, Union County and State of New Jersey.

2. At the aforementioned place and time, plaintiff, JESSIKA CINTRON was the operator and owner of a vehicle being driven on Cayuga Road in the City of Cranford, Union County and State of New Jersey when she was struck by defendants, KENNETH DIAZ and J&B HUNT's vehicle.

3. At the time and place aforesaid, defendants, KENNETH DIAZ and J&B HUNT negligently and/or carelessly operated, owned, maintained, controlled and/or supervised said motor vehicle and as a direct result of said negligence, caused the collision at issue herein.

5. As a direct and proximate result of the negligence of the defendants, KENNETH DIAZ and J&B HUNT, the plaintiff, JESSIKA CINTRON was caused to sustain severe, serious and permanent injuries. She was caused to suffer great pain and anguish and will in the future be caused to suffer great pain and anguish; she was caused to incur medical expenses and will, in the future be caused to incur medical expenses; has been and will be in the future disabled and prevented from attending to her necessary affairs.

6. As direct and proximate result, the plaintiff, JESSIKA CINTRON will in the future be unable to pursue her usual duties, occupation and responsibilities; and as a further result thereof, hospital treatment, medical treatment and medicines were necessary for the care and treatment of the plaintiff, JESSIKA CINTRON and the plaintiff suffered other diverse and associated financial losses and expenses.

WHEREFORE, the plaintiff, JESSIKA CINTRON demands judgment against the defendants, KENNETH DIAZ and J&B HUNT individually, jointly and severally and in the alternative for damages, interest and costs of suit.



SECOND COUNT

1. Plaintiff repeats the allegations of the First Count as set forth at length herein.

2. At the time and place aforementioned, defendant, KENNETH DIAZ was operating a vehicle in the scope of his employment for defendant, J&B HUNT.

3. At the time and place aforementioned, defendant, KENNETH DIAZ was operating a vehicle at the direction of J&B HUNT.

WHEREFORE, the plaintiff, JESSIKA CINTRON demands judgment against the defendant, J&B HUNT under the theory of vicarious liability.

THIRD COUNT

1. Plaintiff repeats the allegations of the First and Second Counts as set forth at length herein.

4. The defendant, J&B HUNT was negligent in hiring of the defendant, KENNETH DIAZ as well as in its entrustment of KENNETH DIAZ with the vehicle in which J&B HUNT owned.

WHEREFORE, the plaintiff, JESSIKA CINTRON demands judgment against the defendant, J&B HUNT under the theories of negligent entrustment and negligent hiring.

FOURTH COUNT

1. Plaintiff, JESSIKA CINTRON repeats and re-alleges the allegations of the First, Second and Third Counts of the Complaint as if more fully set forth at length herein.

2. At the time and place aforesaid John Does 1-10, negligently and/or carelessly operated, owned, maintained, controlled and/or supervised said motor vehicle and as a direct result of said negligence, caused the collision at issue herein.

3. As a direct and proximate result of the negligence of the defendant, John Does 1-10, the plaintiff, JESSIKA CINTRON was caused to sustain severe, serious and permanent injuries. She was caused to suffer great pain and anguish and will in the future be caused to suffer great pain and anguish; she was caused to incur medical expenses and will, in the future be caused to incur medical expenses; has been and will be in the future disabled and prevented from attending to her necessary affairs.

WHEREFORE, the plaintiff, JESSIKA CINTRON demands judgment against the defendants, John Does 1-10, individually, jointly and severally and in the alternative for damages, interest and costs of suit.

JURY DEMAND

*PLEASE TAKE NOTICE*, that the plaintiff herein does hereby demand a trial by jury of the within cause of action on all issues.

#### CERTIFICATION PURSUANT TO RULE 4:5-1

Pursuant to 4:5-1, it is stated that the matter in controversy is not the subject of any other action pending in any other court or of a pending arbitration proceeding to the best of our knowledge or belief. Also, to the best of our belief, no other action or arbitration proceeding contemplated. Further, other than the parties set forth in this pleading, we know of no other parties that should be joined in the above action. In addition, we recognize the continuing obligation of each party to file and serve on all parties and the Court an amended certification if there is a change in the facts stated in this original certification.

#### DESIGNATION OF TRIAL COUNSEL

Gregg A. Williams, Esq. is hereby designated as trial counsel.

#### TIME UNIT RULE

Pursuant to Rule 1:7-1(b), plaintiff will utilize the time unit argument, and this shall serve as notice to the defendant of that argument. As required by Rule 1:7-1, the trial judge shall instruct the jury with respect to this argument, and the suggested instruction is as follows:

"Plaintiff has utilized an argument in the summation that you can consider damages on a time unit basis. This is permissible argument but does not constitute evidence."





### DEMAND FOR DISCOVERY OF INSURANCE COVERAGE

Pursuant to Rule 4:10-2(b), demand is made that defendants disclose to plaintiff's attorney whether or not there are any insurance agreements or policies under which any person or firm carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in this action, or indemnify or reimburse for payments made to satisfy the judgment, and provide plaintiff's attorney with true copies of those insurance agreements or policies, including, but not limited to, any and all declaration sheets. This demand shall include and cover not only primary coverage, but also all excess, catastrophe, and umbrella policies.

### INTERROGATORIES

Plaintiff demands that defendants answer Form C and Form C (1) as applicable of the Interrogatories contained in the Appendix II of the Rules Governing the Rules of the State of New Jersey.

### SUPPLEMENTAL INTERROGATORIES

1. Please detail all conversations you had or overheard being had by plaintiff and any other occupants of the vehicle plaintiff was in.
2. If you made any physical observations of the plaintiff after the accident, please provide details as to what you observed plaintiff doing before either of you left the accident scene.

3. What is the carrier name and number of any cell phones in your vehicle at the time of the accident?

4. If you observed the plaintiffs prior to the accident set forth in the complaint, please set forth the time that elapsed from the time that you first saw plaintiff until the impact occurred.

5. What did you do during the time period after the impact until you left the scene of the accident?

6. From the time when you first saw plaintiff's, please state what happened with the speeds of your vehicle from that point until the time the impact occurred making sure to indicate the speed at time of impact.

7. If this party does not accept full responsibility for the happening of the accident, please indicate what the driver of the plaintiff did that contributed to the happening of this accident.

8. Please review the police report in this matter and advise if you find the accident description section and any diagrams contained in the report complete and accurate? If not, in what way is it inaccurate or incomplete?

9. State whether the answering defendant ever operates his or her vehicle as a ride-sharing service (Lyft, Uber etc.) or as a livery taxi service.

10. State whether the answering defendant was operating his or her vehicle as a ride-sharing service (Lyft, Uber etc.) or as a livery taxi service at the time of the accident.

### DEMAND FOR PRODUCTION

Demand is hereby made upon you pursuant to Rule 4:10-2 and 4:18-1 for you to produce for inspection and copying the Law Offices of Gregg Williams 197 Route 18 South- Suite 232S, East Brunswick New Jersey on the 50<sup>th</sup> day following the service date of this notice, all of the documents and items listed on the attached:

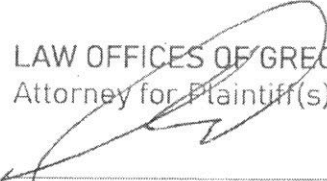
You are requested to respond to this Demand for Production in writing within the time requested above pursuant to Rule 4:18-1, and indicate in your response, on an item by item basis, the following:

1. Copies of any pictures of the defendant's or plaintiff's vehicles depicting damages as a result of this accident which is the subject matter of this Complaint.
2. Copies of any pictures or diagrams showing the scene of the accident.
3. Any written papers, documents, statements, pictures, diagrams, movies which the defendant relied on to refresh his or her memory in preparation for answering interrogatories or testimony in depositions.

Dated: August 5, 2020

LAW OFFICES OF GREGG A. WILLIAMS  
Attorney for Plaintiff(s), Jessika Cintron

GAW:dg

  
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GREGG A. WILLIAMS, ESQ.



Revised Form Promulgated by 01/31/2020 Notice to the Bar, CN 10517 (Appendix XII-B1)

## Civil Case Information Statement

### Case Details: MIDDLESEX | Civil Part Docket# L-005735-20

Case Caption: CINTRON JESSIKA VS J&B HUNT  
Case Initiation Date: 08/05/2020  
Attorney Name: GREGG ADAM WILLIAMS  
Firm Name: GREGG A. WILLIAMS  
Address: 197 ROUTE 18 STE 232  
EAST BRUNSWICK NJ 08816  
Phone: 7325146635  
Name of Party: PLAINTIFF : CINTRON, JESSIKA  
Name of Defendant's Primary Insurance Company  
(if known): None

Case Type: AUTO NEGLIGENCE-PERSONAL INJURY (NON-  
VERBAL THRESHOLD)

Document Type: Complaint with Jury Demand

Jury Demand: YES - 6 JURORS

Is this a professional malpractice case? NO

Related cases pending: NO

If yes, list docket numbers:

Do you anticipate adding any parties (arising out of same  
transaction or occurrence)? YES

Are sexual abuse claims alleged by: JESSIKA CINTRON? NO

THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE  
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION

Do parties have a current, past, or recurrent relationship? NO

If yes, is that relationship:

Does the statute governing this case provide for payment of fees by the losing party? NO

Use this space to alert the court to any special case characteristics that may warrant individual  
management or accelerated disposition:

Do you or your client need any disability accommodations? NO

If yes, please identify the requested accommodation:

Will an interpreter be needed? NO

If yes, for what language:

Please check off each applicable category: Putative Class Action? NO Title 59? NO Consumer Fraud? NO

I certify that confidential personal identifiers have been redacted from documents now submitted to the  
court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b)

08/05/2020  
Dated

/s/ GREGG ADAM WILLIAMS  
Signed



<b>ATLANTIC COUNTY:</b> Deputy Clerk of the Superior Court Civil Division, Direct Filing 1201 Bacharach Blvd., First Fl. Atlantic City, NJ 08401 LAWYER REFERRAL (609) 345-3444 LEGAL SERVICES (609) 348-4200	<b>CUMBERLAND COUNTY:</b> Deputy Clerk of the Superior Court Civil Case Management Office Broad & Fayette Sts., P.O. Box 615 Bridgeton, NJ 08302 LAWYER REFERRAL (856) 692-6207 LEGAL SERVICES (856) 451-0003	<b>MERCER COUNTY:</b> Deputy Clerk of the Superior Court Local Filing Office, Courthouse 175 S. Broad Street, P.O. Box 8068 Trenton, NJ 08650 LAWYER REFERRAL (609) 585-6200 LEGAL SERVICES (609) 695-6249	<b>SALEM COUNTY:</b> Deputy Clerk of the Superior Court 92 Market St., P.O. Box 18 Salem, NJ 08079 LAWYER REFERRAL (856) 935-5628 LEGAL SERVICES (856) 451-0003
<b>BERGEN COUNTY:</b> Deputy Clerk of the Superior Court Case Processing Section, Room 119 Justice Center, 10 Main St. Hackensack, NJ 07601-0769 LAWYER REFERRAL (201) 488-0044 LEGAL SERVICES (201) 487-2166	<b>ESSEX COUNTY:</b> Deputy Clerk of the Superior Court 50 West Market Street Room 131 Newark, NJ 07102 LAWYER REFERRAL (973) 622-6207 LEGAL SERVICES (973) 624-4500	<b>MIDDLESEX COUNTY:</b> Deputy Clerk of the Superior Court Administration Building Third Floor 1 Kennedy Sq., P.O. Box 2633 New Brunswick, NJ 08903-2633 LAWYER REFERRAL (732) 828-0053 LEGAL SERVICES (732) 249-7600	<b>SOMERSET COUNTY:</b> Deputy Clerk of the Superior Court Civil Division Office New Court House, 3rd Fl. P.O. Box 3000 Somerville, NJ 08876 LAWYER REFERRAL (908) 685-2323 LEGAL SERVICES (908) 231-0840
<b>BURLINGTON COUNTY:</b> Deputy Clerk of the Superior Court Central Processing Office Attn: Judicial Intake First Fl., Courts Facility 49 Rancocas Rd. Mt. Holly, NJ 08060 LAWYER REFERRAL (609) 261-4862 LEGAL SERVICES (609) 261-1088	<b>GLOUCESTER COUNTY:</b> Deputy Clerk of the Superior Court Civil Case Management Office Attn: Intake First Fl., Court House 1 North Broad St, P.O. Box 129 Woodbury, NJ 08096 LAWYER REFERRAL (856) 848-4589 LEGAL SERVICES (856) 848-5360	<b>MONMOUTH COUNTY:</b> Deputy Clerk of the Superior Court Court House 71 Monument Park P.O. Box 1269 Freehold, NJ 07728-1269 LAWYER REFERRAL (732) 431-5544 LEGAL SERVICES (732) 866-0020	<b>SUSSEX COUNTY:</b> Deputy Clerk of the Superior Court Sussex County Judicial Center 43-47 High Street Newton, NJ 07860 LAWYER REFERRAL (973) 267-5882 LEGAL SERVICES (973) 383-7400
<b>CAMDEN COUNTY:</b> Deputy Clerk of the Superior Court Civil Processing Office 1st Fl., Hall of Records 101 S. Fifth St. Camden, NJ 08103 LAWYER REFERRAL (856) 964-4520 LEGAL SERVICES (856) 964-2010	<b>HUDSON COUNTY:</b> Deputy Clerk of the Superior Court Superior Court-Civil Records Dept Brennan Court House--1st Floor 583 Newark Ave. Jersey City, NJ 07306 LAWYER REFERRAL (201) 798-2727 LEGAL SERVICES (201) 792-6363	<b>MORRIS COUNTY:</b> Deputy Clerk of the Superior Court Civil Division 30 Schuyler Pl., P.O. Box 910 Morristown, NJ 07960-0910 LAWYER REFERRAL (973) 267-5882 LEGAL SERVICES (973) 285-6911	<b>UNION COUNTY:</b> Deputy Clerk of the Superior Court 1st Fl., Court House 2 Broad Street Elizabeth, NJ 07207-6073 LAWYER REFERRAL (908) 353-4715 LEGAL SERVICES (908) 354-4340
<b>CAPE MAY COUNTY:</b> Deputy Clerk of the Superior Court 9 N. Main Street Box DN-209 Cape May Court House, NJ 08210 LAWYER REFERRAL (609) 463-0313 LEGAL SERVICES (609) 465-3001	<b>HUNTERDON COUNTY:</b> Deputy Clerk of the Superior Court Civil Division 65 Park Avenue Flemington, NJ 08822 LAWYER REFERRAL (908) 735-2611 LEGAL SERVICES (908) 782-7979	<b>OCEAN COUNTY:</b> Deputy Clerk of the Superior Court Court House, Room 119 118 Washington Street Toms River, NJ 08754 LAWYER REFERRAL (732) 240-3666 LEGAL SERVICES (732) 341-2727	<b>WARREN COUNTY:</b> Deputy Clerk of the Superior Court Civil Division Office Court House 413 Second Street Belvidere, NJ 07823-1500 LAWYER REFERRAL (908) 267-5882 LEGAL SERVICES (908) 475-2010
		<b>PASSAIC COUNTY:</b> Deputy Clerk of the Superior Court Civil Division Court House 77 Hamilton St. Paterson, NJ 07505 LAWYER REFERRAL (973) 278-9223 LEGAL SERVICES (973) 345-7171	

Note: Adopted July 13, 1994, effective September 1, 1994; amended June 28, 1996, effective September 1, 1996; address/phone information updated July 1, 1999, effective September 1, 1999; amended July 12, 2002 to be effective September 3, 2002; amended July 27, 2006 to be effective September 1, 2006.